

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

THE PEOPLE OF THE STATE OF CALIFORNIA,
Plaintiff,
v.
01 JADE DOUGLAS HARRIS (05/24/1982)
Defendant(s).

CASE NO. VA127180

FELONY COMPLAINT

The undersigned is informed and believes that:

COUNT 1

On or about October 24, 2012, in the County of Los Angeles, the crime of MURDER, in violation of PENAL CODE SECTION 187(a), a Felony, was committed by JADE DOUGLAS HARRIS, who did unlawfully, and with malice aforethought murder JOSIMAR ROJAS, a human being.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c)."

* * * * *

COUNT 2

On or about October 24, 2012, in the County of Los Angeles, the crime of MURDER, in violation of PENAL CODE SECTION 187(a), a Felony, was committed by JADE DOUGLAS HARRIS, who did unlawfully, and with malice aforethought murder IRENE CARDENAS REYES, a human being.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c)."

* * * * *

COUNT 3

On or about October 24, 2012, in the County of Los Angeles, the crime of MURDER, in violation of PENAL CODE SECTION 187(a), a Felony, was committed by JADE DOUGLAS HARRIS, who did unlawfully, and with malice aforethought murder SUSANA PEREZ RUELAS, a human being.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c)."

It is further alleged as to count(s) 1, 2 and 3 that the offenses charged in counts 1, 2, 3 are a special circumstance within the meaning of Penal Code Section 190.2(a)(3).

It is further alleged as to count(s) 1, 2 and 3 that the murder of SUSANA PEREZ RUELAS, IRENE CARDENAS REYES, JOSIMAR ROJAS was committed by defendant(s), JADE DOUGLAS HARRIS and that the defendant intentionally killed the victim by means of lying in wait, within the meaning of Penal Code Section 190.2(a)(15).

It is further alleged as to count(s) 1, 2 and 3 that the murder of SUSANA PEREZ RUELAS, IRENE CARDENAS REYES, JOSIMAR ROJAS was committed by defendant(s), JADE DOUGLAS HARRIS while the said defendant was/were engaged in the commission of the crime of kidnapping in violation of Penal Code Section 207,209, and 209.5, within the meaning of Penal Code Section 190.2(a)(17).

It is further alleged as to count(s) 1, 2 and 3 that the murder of SUSANA PEREZ RUELAS, IRENE CARDENAS REYES, JOSIMAR ROJAS was committed by defendant(s), JADE DOUGLAS HARRIS while the said defendant was/were engaged in the commission of the crime of carjacking as defined in Penal Code Section 215, within the meaning of Penal Code Section 190.2(a)(17).

It is further alleged, that pursuant to Penal Code section PC190.2(a)(10), that SUSANA PEREZ RUELAS was a witness to a crime and was intentionally killed because of that fact.

* * * * *

COUNT 4

On or about October 24, 2012, in the County of Los Angeles, the crime of ATTEMPTED WILLFUL, DELIBERATE, AND PREMEDITATED MURDER, in violation of PENAL CODE SECTION 664/187(a), a Felony, was committed by JADE DOUGLAS HARRIS, who did unlawfully and with malice aforethought attempt to murder MARIA TERESA MUNOZ, a human being .

It is further alleged that the aforesaid attempted murder was committed willfully, deliberately and with premeditation within the meaning of Penal Code section 664(a) and is a serious felony pursuant to Penal Code section 1192.7(c).

* * * * *

COUNT 5

On or about October 24, 2012, in the County of Los Angeles, the crime of ATTEMPTED WILLFUL, DELIBERATE, AND PREMEDITATED MURDER, in violation of PENAL CODE SECTION 664/187(a), a Felony, was committed by JADE DOUGLAS HARRIS, who did unlawfully and with malice aforethought attempt to murder ANTONIO SALINAS, a human being .

It is further alleged that the aforesaid attempted murder was committed willfully, deliberately and with premeditation within the meaning of Penal Code section 664(a) and is a serious felony pursuant to Penal Code section 1192.7(c).

* * * * *

COUNT 6

On or about October 24, 2012, in the County of Los Angeles, the crime of KIDNAPPING FOR CARJACKING, in violation of PENAL CODE SECTION 209.5(a), a Felony, was committed by JADE DOUGLAS HARRIS, who did unlawfully and during the commission of carjacking, kidnap SUSANA PEREZ RUELAS, not a principal in the carjacking.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c)."

* * * * *

COUNT 7

On or about October 24, 2012, in the County of Los Angeles, the crime of KIDNAPPING FOR CARJACKING, in violation of PENAL CODE SECTION 209.5(a), a Felony, was committed by JADE DOUGLAS HARRIS, who did unlawfully and during the commission of carjacking, kidnap ANTONIO SALINAS, not a principal in the carjacking.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c)."

* * * * *

COUNT 8

On or about October 24, 2012, in the County of Los Angeles, the crime of CARJACKING SPEC ALLEG-USE OF FIREARM, in violation of PENAL CODE SECTION 215(a), a Felony, was committed by JADE DOUGLAS HARRIS, who did unlawfully take a motor vehicle in the possession of SUSANA PEREZ RUELAS from his or her person and immediate presence and from the person and immediate presence and from the person and immediate presence of a passenger of said motor vehicle, against the will and with the intent to permanently and temporarily deprive the person in possession of the motor vehicle of the possession and accomplished by means of force and fear.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c)."

It is further alleged that said defendant(s), JADE DOUGLAS HARRIS personally used a firearm, a handgun, within the meaning of Penal Code Section 12022.53.(b) and PC 1203.06(a)(1).

* * * * *

COUNT 9

On or about October 24, 2012, in the County of Los Angeles, the crime of CARJACKING SPEC ALLEG-USE OF FIREARM, in violation of PENAL CODE SECTION 215(a), a Felony, was committed by JADE DOUGLAS HARRIS, who did unlawfully take a motor vehicle in the possession of ANTONIO SALINAS from his or her person and immediate presence and from the person and immediate presence and from the person and immediate presence of a passenger of said motor vehicle, against the will and with the intent to permanently and temporarily deprive the person in possession of the motor vehicle of the possession and accomplished by means of force and fear.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c)."

It is further alleged that said defendant(s), JADE DOUGLAS HARRIS personally used a firearm, a handgun , within the meaning of Penal Code Section 12022.53.(b) and PC 1203.06(a)(1).

It is further alleged as to count(s) 4, 5, 7 and 9 that in the commission of the above offense the said defendant(s), JADE DOUGLAS HARRIS, personally inflicted great bodily injury upon Antonio Salinas and Maria Teresa Munoz, not an accomplice to the above offense, within the meaning of Penal Code Section 12022.7(a) and also causing the above offense to become a serious felony within the meaning of Penal Code Section 1192.7(c)(8).

* * * * *

COUNT 10

On or about October 24, 2012, in the County of Los Angeles, the crime of KIDNAPPING FOR CARJACKING, in violation of PENAL CODE SECTION 209.5(a), a Felony, was committed by JADE DOUGLAS HARRIS, who did unlawfully and during the commission of carjacking, kidnap SUSANA PEREZ RUELAS, not a principal in the carjacking.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c)."

* * * * *

COUNT 11

On or about October 24, 2012, in the County of Los Angeles, the crime of CARJACKING SPEC ALLEG-USE OF FIREARM, in violation of PENAL CODE SECTION 215(a), a Felony, was committed by JADE DOUGLAS HARRIS, who did unlawfully take a motor vehicle in the possession of SUSANA PEREZ RUELAS from his or her person and immediate presence and from the person and immediate presence and from the person and immediate presence of a passenger of said motor vehicle, against the will and with the intent to permanently and temporarily deprive the person in possession of the motor vehicle of the possession and accomplished by means of force and fear.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code Section 1192.7(c) and a violent felony within the meaning of Penal Code Section 667.5(c)."

It is further alleged that said defendant(s), JADE DOUGLAS HARRIS personally used a firearm, a handgun , within the meaning of Penal Code Section 12022.53.(b) and PC 1203.06(a)(1).

* * * * *

COUNT 12

On or about October 24, 2012, in the County of Los Angeles, the crime of KIDNAPPING, in violation of PENAL CODE SECTION 207(a), a Felony, was committed by JADE DOUGLAS HARRIS, who did unlawfully, forcibly and by instilling fear, steal, take, hold, detain and arrest JOSIMAR ROJAS in LOS ANGELES County, California, and did take the said JOSIMAR ROJAS into another country, state, county and another part of LOS ANGELES County.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c)."

* * * * *

COUNT 13

On or about October 24, 2012, in the County of Los Angeles, the crime of KIDNAPPING, in violation of PENAL CODE SECTION 207(a), a Felony, was committed by JADE DOUGLAS HARRIS, who did unlawfully, forcibly and by instilling fear, steal, take, hold, detain and arrest IRENE CARDENAS REYES in LOS ANGELES County, California, and did take the said IRENE CARDENAS REYES into another country, state, county and another part of LOS ANGELES County.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c)."

It is further alleged as to count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12 and 13 that said defendant(s), JADE DOUGLAS HARRIS personally and intentionally discharged a firearm, a handgun, which caused great bodily injury and death to SUSANA PEREZ RUELAS, IRENE CARDENAS REYES, MARIA TERESA MUNOZ, JOSIMAR ROJAS, ANTONIO SALINAS within the meaning of Penal Code Section 12022.53(d) also causing the above offense to become a serious felony pursuant to Penal Code section 1192.7(c)(8) and a violent felony within the meaning of Penal Code section 667.6(c)(8).

It is further alleged that said defendant(s), JADE DOUGLAS HARRIS personally and intentionally discharged a firearm, a handgun, within the meaning of Penal Code Section 12022.53(c) also causing the above offense to become a serious felony pursuant to Penal Code section 1192.7(c)(8) and a violent felony within the meaning of Penal Code section 667.5(c)(8).

It is further alleged that said defendant(s), JADE DOUGLAS HARRIS personally used a firearm, a handgun, within the meaning of Penal Code Section 12022.53(b) also causing the above offense to become a serious felony pursuant to Penal Code section 1192.7(c)(8) and a violent felony within the meaning of Penal Code section 667.5(c)(8).

* * * * *

COUNT 14

On or about October 24, 2012, in the County of Los Angeles, the crime of POSSESSION OF FIREARM BY A FELON - PRIOR(S), in violation of PENAL CODE SECTION 29800(a)(1), a Felony, was committed by JADE DOUGLAS HARRIS, who did unlawfully own, possess, purchase, receive, and have custody and control of a firearm, to wit, handgun, the said defendant having theretofore been duly and legally convicted of a felony or felonies, to wit:

<u>Case No.</u>	<u>Charge Code/Statute</u>	<u>Conv. Date</u>	<u>County of Court</u>	<u>State</u>	<u>Court Type</u>
BA270927	PC 211	07/27/2005	LOS ANGELES	CA	SUPERIOR
BA270927	PC 664/211	07/27/2005	SUPERIOR	CA	LOS ANGELE
BA251715	PC 12025(A)(1)	08/12/2003	LOS ANGELES	CA	SUPERIOR

* * * * *

It is further alleged as to count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13 and 14 pursuant to Penal Code section(s) 667(b) through (i) that the defendant(s), JADE DOUGLAS HARRIS, has suffered the following prior conviction(s) of a serious or violent felony or juvenile adjudication:

<u>Case No.</u>	<u>Charge Code/Statute</u>	<u>Conv. Date</u>	<u>County of Court</u>	<u>State</u>	<u>Court Type</u>
BA270927	PC 211	07/27/2005	LOS ANGELES	CA	SUPERIOR
BA270927	PC 664/211	07/27/2005	LOS ANGELES	CA	SUPERIOR

It is further alleged as to count(s) 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13 and 14 pursuant to Penal Code section 667.5(b) that the defendant(s), JADE DOUGLAS HARRIS, has suffered the following prior conviction(s):

<u>Case No.</u>	<u>Charge Code/Statute</u>	<u>Conv. Date</u>	<u>County of Court</u>	<u>State</u>	<u>Court Type</u>
BA270927	PC 211	07/27/2005	LOS ANGELES	CA	SUPERIOR
BA270927	PC 664/ 211	07/27/2005	LOS ANGELES	CA	SUPERIOR

and that a term was served as described in Penal Code section 667.5 for said offense(s), and that the defendant did not remain free of prison custody for, and did commit an offense resulting in a felony conviction during, a period of five years subsequent to the conclusion of said term.

NOTICE: Conviction of this offense will require the defendant to provide DNA samples and print impressions pursuant to Penal Code sections 296 and 296.1. Willful refusal to provide the samples and impressions is a crime.

NOTICE: The People of the State of California intend to present evidence and seek jury findings regarding all applicable circumstances in aggravation, pursuant to Penal Code section 1170(b) and *Cunningham v. California* (2007) 549 U.S. 270.

NOTICE: A Suspected Child Abuse Report (SCAR) may have been generated within the meaning of Penal Code §§ 11166 and 11168 involving the charges alleged in this complaint. Dissemination of a SCAR is limited by Penal Code §§ 11167 and 11167.5 and a court order is required for full disclosure of the contents of a SCAR

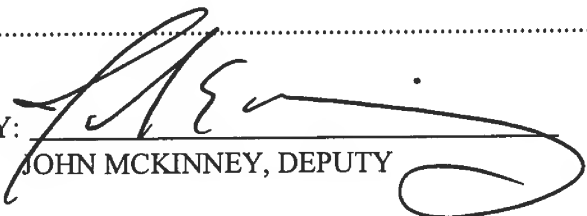
NOTICE: Any allegation making a defendant ineligible to serve a state prison sentence in the county jail shall not be subject to dismissal pursuant to Penal Code § 1385.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT, CASE NUMBER VA127180, CONSISTS OF 14 COUNT(S).

Executed at DOWNEY, County of Los Angeles, on October 29, 2012.


DETECTIVE P. HERNANDEZ
DECLARANT AND COMPLAINANT

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STEVE COOLEY, DISTRICT ATTORNEY

BY: 
JOHN MCKINNEY, DEPUTY

AGENCY:
DR NO.:

I/O:
OPERATOR: ER

ID NO.: PHONE:
PRELIM. TIME EST.: 2 Hrs.

<u>DEFENDANT</u>	<u>CII NO.</u>	<u>DOB</u>	<u>BOOKING NO.</u>	<u>BAIL RECOM'D</u>	<u>CUSTODY R'TN DATE</u>
HARRIS, JADE DOUGLAS	011780501	5/24/1982	3347435	NO BAIL	10/29/2012

Pursuant to Penal Code Section 1054.5(b), the People are hereby informally requesting that defense counsel provide discovery to the People as required by Penal Code Section 1054.3.

FELONY COMPLAINT -- ORDER HOLDING TO ANSWER -- P.C. SECTION 872

It appearing to me from the evidence presented that the following offense(s) has/have been committed and that there is sufficient cause to believe that the following defendant(s) guilty thereof, to wit:

(Strike out or add as applicable)

JADE DOUGLAS HARRIS

<u>Count No.</u>	<u>Charge</u>	<u>Charge Range</u>	<u>Special Allegation</u>	<u>Alleg. Effect</u>
1	PC 187(a)	Check Code State Prison	PC 190.2(a)(15)	LWOP/Death
				State Prison
			PC 190.2(a)(17)	LWOP/Death
				State Prison
			PC 12022.53(d)	+25 Yrs. to Life, MSP*
2	PC 187(a)	Check Code State Prison	PC 190.2(a)(17)	LWOP/Death
				State Prison
			PC 190.2(a)(3)	LWOP/Death
				State Prison
			PC 190.2(a)(15)	LWOP/Death
3	PC 187(a)	Check Code State Prison		State Prison
			PC 190.2(a)(17)	LWOP/Death
				State Prison
			PC 12022.53(d)	+25 Yrs. to Life, MSP*
			PC 190.2(a)(17)	LWOP/Death
4	PC 664/187(a)	Life State Prison		State Prison
			PC 190.2(a)(3)	LWOP/Death
				State Prison
			PC 190.2(a)(10)	LWOP/Death
				State Prison
5	PC 664/187(a)	Life State Prison	PC 190.2(a)(15)	LWOP/Death
				State Prison
			PC 190.2(a)(17)	LWOP/Death
				State Prison
			PC 12022.53(d)	+25 Yrs. to Life, MSP*
6	PC 209.5(a)	Life State Prison	PC 190.2(a)(17)	LWOP/Death
				State Prison
			PC 190.2(a)(3)	LWOP/Death
				State Prison
			PC 12022.7(a)	+3 Yrs State Prison
7	PC 209.5(a)	Life State Prison		+25 Yrs. to Life, MSP*
			PC 12022.53(d)	
				+25 Yrs. to Life, MSP*
			PC 12022.7(a)	+3 Yrs State Prison
			PC 12022.53(d)	+25 Yrs. to Life,

8	PC 215(a)	3-5-9+10 State Prison	PC 12022.53(d)	MSP* +25 Yrs. to Life, MSP*
9	PC 215(a)	3-5-9+10 State Prison	PC 12022.53(b) PC 12022.7(a) PC 12022.53(d)	+3 Yrs State Prison +25 Yrs. to Life, MSP*
10	PC 209.5(a)	Life State Prison	PC 12022.53(d)	+25 Yrs. to Life, MSP*
11	PC 215(a)	3-5-9+10 State Prison	PC 12022.53(d)	+25 Yrs. to Life, MSP*
12	PC 207(a)	3-5-8, +5 State Prison	PC 12022.53(b) PC 12022.53(d)	+25 Yrs. to Life, MSP*
13	PC 207(a)	3-5-8 State Prison	PC 12022.53(d)	+25 Yrs. to Life, MSP*
14	PC 29800(a)(1)	16-2-3	PC 667(b)-(i) PC 667.5(b)	MSP Check Code State Prison +1 yr. per prior

I order that the defendant(s) be held to answer therefore and be admitted to bail in the sum of:

JADE DOUGLAS HARRIS _____ Dollars

and be committed to the custody of the Sheriff of Los Angeles County until such bail is given. Date of arraignment in Superior Court will be:

JADE DOUGLAS HARRIS _____ in Dept _____

at: _____ A.M.

THE DOCUMENT TO WHICH THIS CERTIFICATE
IS ATTACHED IS A FULL, TRUE AND CORRECT
COPY OF THE ORIGINAL ON FILE AND OF
RECORD IN MY OFFICE.

Attest, 10-29-12, JOHN A. CLARKE
Executive Officer/Clerk of the Superior Court of
California, County of Los Angeles.

By [Signature] Deputy

Date: _____

Committing Magistrate

